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From:

Sent: Wednesday, March 20, 2013 9:33 AM

To:

Cc:

Subject: 872 question

- your advice is correct except that the parent of the TMP need not sign the new Form 872-P. Treas. Reg. 1.1502-77(a)(3)(v), effective for taxable years beginning on or after June 28, 2002 resolved this issue.

[REDACTED]

But the sub partner cannot extend the statute for the parent and other subs under this provision and we typically only assess the parent. So we don't really need the sub to sign the parent extension.

in can help you with the caption of Form 872. I think it may only need to specify the parent name "and subsidiaries", but may have a more particularized way of doing this.